

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

SCOTT MCCANDLISS, )  
DMIDRIY ABRAMYAN, ABDIKADIR )  
AHMED, AHMED KATUN AHMED, )  
AHMED HASSAN, BEN STEWART )  
ROUNTREE, FAHEEM IQBAL )  
QURESHI, ANTHONY D. LOGAN, )  
MOHAMED ABDULLE, )  
HAMOUD S. ALDAHABALI, JAMAL )  
ABDI, ABDILAH AWALE, )  
MOHAMED A. HUSSEIN )  
and all others similarly situated, )  
Plaintiffs )

v. )

UBER TECHNOLOGIES, INC., )  
UBER TECHNOLOGIES (GA), INC., )  
RASIER, LLC )  
and )  
KEITH RADFORD, AHMED SIMJEE, )  
JOSHUA GANTT, LESLIE GILMARTIN, )  
BRIAN GIQUEL, CHRISTOPHER BOSAK, )  
CHRISTOPHER JOHNSON, KEVIN )  
BUTTIMER, DANIEL ANDERSON, JOHN )  
STETTNER, RACHEL PIETROCOLA, )  
JOSH VARCOE, FABIAN FERNANDEZ, )  
AMINUR CHOUDHURY, SEID SHEK, )  
ABEBE TESFAYE, SAMUEL WORKU, )  
JEAN RICHARD PIERRE, ALEXANDER )  
AGBAERE, AYODELE OKPODU, )  
BELAY DAGNEW, individually and )  
all others similarly situated, )  
Defendants.

Joint  
Request for Conference

Civil Action File No.  
1:14-03275- WSD

Class Action

### **JOINT REQUEST FOR CONFERENCE**

All Parties respectfully request a time to personally appear (or by phone where necessary) before the Court for a Conference pursuant to this Court's Standing Order to address several matters. The parties have engaged in discussions regarding the new legislation enacted and its potential effects on the Amended Complaint and several motions now pending before the Court. *See* Dkt. No. 47 (discussing new legislation creating regulatory classifications applicable to "transportation network compan[ies]" and "ride share network service[s]" that use "digital network[s]" to connect passengers with third-party transportation providers); Dkt. No. 38 (Motion to Dismiss by Keith Radford); Dkt. No. 39 (Motion to Dismiss by Driver Defendants); Dkt. No. 40 (Motion to Dismiss by Uber Technologies, Inc., Uber Technologies (GA) Inc., and Rasier, LLC).

With the Court's participation, certain issues may be simplified and addressed in a more comprehensive fashion than with the Amended Complaint and motions in their current form. Additionally, the parties have had difficulty fully completing a Joint Preliminary Report and Discovery Plan due to the pending Motion to Remand and Motions to Dismiss and would like direction from the Court as to how it wishes for them to proceed.

Plaintiffs have previously requested a conference to address other minor matters including Plaintiffs' Motion to Correct the Docket [Doc. 8]; Plaintiffs' Notice of Pending Related Case and Defendants' Response [Doc. 24, 34 & 36]; and Plaintiffs' Notice Regarding Partners of Rasier, LLC [Doc. 25]. Plaintiffs separately request that the Court also address these issues at the conference, which should take very little time to address. Defendants believe the Court need not address these filings at the conference, but will be prepared to address them if the Court wishes to do so.

The parties respectfully request the Court to schedule a conference with attorneys for all parties at the Court's earliest convenience. The conference should take approximately 1-2 hours.

Respectfully submitted this 20<sup>th</sup> day of May, 2015.

Counsel for Plaintiffs

/s/ William A. Pannell

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Counsel for Keith Radford and Driver  
Defendants

*/s/ Michael W. Tyler*

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LOCAL RULE 7.1 CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing pleading filed with the Clerk of Court has been prepared in 14 point Times New Roman font in accordance with Local Rule 5.1(C).

Dated: May 20, 2015.

*/s/ William A. Pannell*  
William A. Pannell

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 20, 2015, I filed a copy of the foregoing document using the Court's ECF/CM system, which will automatically send notice of such filing to counsel for Defendants:

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Dated: May 20, 2015.

/s/ William A. Pannell  
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